

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re: PROMESA
Title III
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, *et al.*
(Jointly Administered)
Debtors.¹
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**URGENT UNOPPOSED MOTION SEEKING EXTENSION OF DEADLINE TO
FILE STATEMENT OF O’NEILL & BORGES LLC DISCLOSING CONNECTIONS
TO MATERIAL INTERESTED PARTIES PURSUANT TO
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

To the Honorable United States District Court Judge Laura Taylor Swain:

O’Neill & Borges LLC (“O&B”), as Puerto Rico counsel for the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as representative of the Commonwealth of Puerto Rico (“Commonwealth”), the Puerto Rico Sales Tax Financing Corporation (“COFINA”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System for the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Electric Power Authority (“PREPA”) and the Puerto Rico Public Buildings Authority jointly

¹ The Debtors in the jointly-administered Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(“PBA,” with the Commonwealth, COFINA, HTA, ERS and PREPA referred to as “Debtors”), as Title III debtors, by and through the Oversight Board, as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully submits this motion (the “Motion”), for entry of an order, substantially in the form attached hereto as **Exhibit A**, extending the deadline for O&B to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy In Disclosures Act* (Docket Entry No. 20467) (“Order”) and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 (“PRRADA”). In support of this Motion, O&B respectfully represents as follows:

Relief Requested

1. On May 16, 2022, the Court entered the *Order Granting Urgent Unopposed Motion Seeking Extension of Deadline to File Verified Statement of O’Neill & Borges LLC Disclosing Connections to Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosure Act* (Docket Entry No. 20801) whereby it granted O&B until June 30, 2022 to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy In Disclosures Act* (Docket Entry No. 20467) and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 (“PRRADA”).

2. On June 22, 2022, the United States Trustee filed the *Motion of the United States Trustee to Amend the Third Amended Order Setting Procedures for Interim and Final Compensation and Reimbursement of Expenses of Professionals* (Docket Entry No. 21316).

3. On June 24, 2022, the Court entered the *Order on Motion of the United States Trustee for Amendment of the Third Amended Order Setting Procedures for Interim and Final*

² PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

Compensation and Reimbursement of Expenses of Professionals (ECF No. 20546) (“Order”) whereby, among other things, it granted hired professionals who had not yet filed PRRADA disclosures, until July 15, 2022, to file the PRRADA disclosures.

4. By this Motion, O&B informs the Court that, as it strives to file its verified statement pursuant to PRRADA as soon as possible, it will require an extension of seven (7) days, that is, until July 7, 2022, to finalize and file its statement. Accordingly, O&B requests an extension of seven (7) days to submit its verified statement.

5. O&B obtained the consent of the U.S. Trustee for this extension of time.

6. O&B hereby certifies that there is a true need for urgent relief and that such urgency was not created through any lack of due diligence.

WHEREFORE O&B respectfully requests the Court to enter the Proposed Order attached hereto as **Exhibit A**, granting the relief requested herein and all other relief that is just and proper.

Dated: June 30, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Carla García Benítez
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*Attorneys for the Financial
Oversight and Management Board
as Representative for the Debtors*

CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Carla García Benítez

Carla García Benítez

Exhibit A

Proposed Order

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DISTRICT OF PUERTO RICO**

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Title III
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as representative of No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, *et al.*
(Jointly Administered)
Debtors.¹
-----X

**ORDER EXTENDING DEADLINE TO
FILE VERIFIED STATEMENT PURSUANT TO
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

Upon the *Urgent Unopposed Motion Seeking Extension of Deadline to File Verified Statement of O'Neill & Borges LLC Disclosing Connections to Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosure Act* (the “Motion”);² and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

¹ The Debtors in the jointly-administered Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

1. The Motion is granted as set forth herein.
2. The deadline for O'Neill & Borges LLC to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20467] and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82, shall be extended to **July 7, 2022**.
3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.
4. This Order resolves docket entry no. _____.

SO ORDERED.

Dated: _____, 2022
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
United States District Judge